

Safe Injection Practices Policy Task Force

Electronic Submission via email (BSI@cdc.gov) and fax (404-639-4049)

December 3, 2009

Tanja Popovic, MD, PhD
Chief Science Officer
Centers for Disease Control and Prevention
1600 Clifton Rd., NE
Atlanta, GA 30333

Dear Dr. Popovic:

As members of the Safe Injection Practices Policy Task Force (SIP PTF), we appreciate the opportunity to comment on the Centers for Disease Control and Prevention's (CDC) *Draft Guidelines for the Prevention of Intravascular Catheter-Related Infections* published in the November 3, 2009 *Federal Register*.

The SIP PTF was formed in response to the rising number of outbreaks of infectious disease as a result of syringe re-use and the misuse of singledose and multidose drug containers. In the last decade, more than 150,000 patients in the United States were notified of potential exposure to hepatitis B virus (HBV), hepatitis C virus (HCV), and HIV due to lapses in basic infection control practices in healthcare settings. The majority of these cases derive from the re-use of syringes, the misuse of singledose vials, and the re-entry into a multidose medication vial or other infusion containers. *The members of the SIP PTF, which include patients, providers and industry partners, are committed to reinforcing the appropriate use of medical equipment required for injections and infusions.*

We wish to express our support for the new guideline addressing the proper use of multidose medication vials. This new guidance is detailed in the "Multidose Parenteral Medication Vials and Parenteral Fluids" section (lines 1151 and 1152) of the draft guideline:

"Use the needle and syringe to access the multidose vial only once and to then discard both safely. This applies to each and every dose withdrawn from the vial."

The SIP PTF encourages the CDC and the Healthcare Infection Control Practices Advisory Committee (HICPAC) to expand this guidance to further reflect the importance of using only one needle and one syringe to access multidose vials and other infusion containers, like those that contain parenteral fluids. We would like to request your consideration of the following revision to the guideline:

"Use the needle and syringe to access the multidose vial or infusion container only one time and then discard both the needle and syringe safely. This applies to each

and every withdrawal from the vial or container."

The SIP PTF encourages the CDC and HICPAC to expand **all** guidance to further emphasize the importance of using one needle, one syringe, and only one time to access singledose and multidose vials and other infusion containers, to include those that contain parenteral fluids.

Thank you for the opportunity to comment on this important matter. Please do not hesitate to contact us if you have any questions or if we can provide additional information.

Sincerely,

American Association of Nurse Anesthetists (AANA)

Healthcare Accreditation Resources LLC

Association for Professionals in Infection Control and Epidemiology (APIC)

BD (Becton, Dickinson and Company)

Hepatitis Outbreaks National Organization for Reform (HONORreform)

Premier, Inc.